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April 30, 2015

Honorable Joseph E. Irenas
Mitchell H. Cohen U.S. Courthouse and Federal Building
400 Cooper Street, Room 1050
Camden, NJ 08101

Re: United States v. Joseph Sigelman, Crim. No. 14-263-1 (JEI)

Dear Judge Irenas:

The Court issued an order on April 8, 2015 that the Government initiate MLAT proceedings with Colombia in an effort to make David Duran available for testimony as a defense witness in the upcoming trial in this case. The Government has informed us that, as part of this process, the Colombian authorities will require that it identify specific dates for Mr. Duran's testimony.

The Government estimates that its case-in-chief will be concluded by June 9, 2015, or about four or five trial days. Accordingly, the Government has proposed June 10-12, 2015, for Mr. Duran's testimony via live video feed (if possible). The defense has no objection to the Government's proposal and has so informed the Government.

Nonetheless, given the possibility that the Government's case-in-chief may not be concluded by June 9 (because, for example, it is difficult to predict the length of cross examinations of Government witnesses in advance of trial), neither party would have an objection to taking Mr. Duran's testimony out of order if the Government has not rested by June 10.

Should that circumstance arise, and Mr. Duran has indeed been made available for testimony, the defense intends to seek the Court's leave to take his testimony out of order. The Government has represented that it would have no objection to interrupting its case-in-chief for this purpose.

Respectfully submitted,



William A. Burck

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